

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

## **FACTUAL STIPULATION**

1. On March 21, 2010, defendant, Blake Joseph Young, was in his motor home in a church parking lot in Alton, Illinois. On occasion, Young had attended the church. While parked outside the church in his motor home, Young asked "D.B.," a twelve year old boy who he knew from church, to enter the motor home. Once inside the motor home, Young offered to pay D.B. \$20 if D.B. would permit Young to take pictures of D.B. Young then pulled down D.B.'s pants and underwear took photographs of D.B.'s unclothed penis.
2. Young also showed D.B. nude photos of another minor child's penis which Young had stored on Young's Samsung cellular phone.
3. Two witnesses observed D.B. and Young exiting the motor home.
4. Upon arriving home later that day, D.B. reported the offense to his family member and then to the Alton Police Department, which immediately commenced an investigation. Police quickly located Young's motor home and pulled it over. Young admitted that he knew D.B., but he denied that D.B. had been in his motor home earlier in the day or that he had touched or photographed D.B.

5. Based upon D.B.'s report of a crime, police arrested Young and towed his motor home. Police then obtained a warrant to search the motor home and recovered the Samsung cellular phone. Police obtained an additional search warrant for the contents of the Samsung phone. A search of the Samsung phone, which included camera functionality, revealed close up photographs of the unclothed penis of D.B. and close up photos of the unclothed penis of another minor child, who was later identified as M.M. One could tell from the background of the photos of D.B. that they were taken inside Young's motor home. Other photographs on the phone of a legal nature featured Young's face or name, tending to establish his possession and dominion over the phone.

6. M.M. was interviewed and indicated that Young had taken the photographs of M.M.'s penis when M.M. was fifteen.

7. Because Young knew both D.B. and M.M., he was fully aware that both were minors under the age of 18. The photographs of D.B. and M.M. which Young took using his Samsung phone constituted lascivious exhibition of the genitals of D.B. and M.M. In taking the photographs, Young used D.B. and M.M., who were both minors at the time, to take part in sexually explicit conduct for the purpose of producing a visual depiction of such conduct.

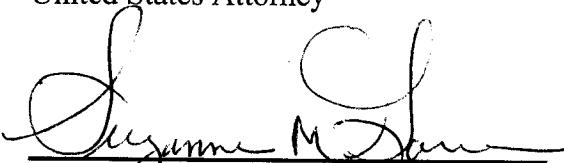
8. The Samsung cellular phone was manufactured in China, thus it had moved in interstate commerce prior to Young's possession of it in Madison County, Illinois, on March 21, 2010.

Blake Young  
BLAKE JOSEPH YOUNG  
Defendant

~~STEPHEN C. WILLIAMS~~  
Attorney for Defendant

Date: 8/31/10

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Date: August 31, 2010